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G4S SECURITY SOLUTIONS USA, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TEAH JAYNES, individually,
Plaintiff,

v.

G4S SECURITY SOLUTIONS USA, INC.;
JANE DOE 1; DOES 2 through 5; ROE
CORPORATIONS 1 through 5
Defendants.

CASE NO.: 2:13-cv-00788-KJD-CWH

STATEMENT IN SUPPORT OF REMOVAL

Petitioner G4S SECURITY SOLUTIONS USA, INC. responds to the Court's Minute Order of May 6, 2013 regarding the basis for removal of this action from Nevada State District Court to this U.S. District Court by stating the following:

1. The Complaint was filed on April 29, 2013 and was served on Defendant on May 1, 2013.
2. The Summons and Complaint were served simultaneously on May 1, 2013 on Defendant.
3. Plaintiff TEAH JAYNES is a citizen of the State of Nevada. Defendant G4S SECURITY SOLUTIONS USA, INC is a Florida Corporation with its principal

1 place of business in Florida. The amount in controversy exceeds \$75,000.00 based
2 on Plaintiff demanding \$35,000 and alleging punitive damages in excess of
3 \$100,000 prior to filing the Complaint and alleging punitive damages in her
4 Complaint.

5 4. The Notice and Petition for Removal were filed within thirty days of service of the
6 summons and complaint.

7 5. N/A

8 6. N/A

9
10 BARRON & PRUITT, LLP.

11
12 By 

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of May, 2013, I deposited the foregoing
STATEMENT REGARDING REMOVAL in the United States Mail, postage prepaid,
addressed to the following:

Frank Perez
McCullough, Perez & Associates
601 So. Rancho Dr.
Ste. A-10
Las Vegas NV 89106-4898
Attorneys for Plaintiff


An Employee of BARRON & PRUITT, LLP

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